UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
REGION IX
75 Hawthorne Street
San Francisco, CA 94105

WASTE MANAGEMENT DIVISION
RCRA ENFORCEMENT OFFICE
RCRA COMPLIANCE EVALUATION INSPECTION REPORT

Purpose:	RCRA Compliance Evaluation Inspection
Facility:	**Pyramid Circuits, Inc.** **1405 Richard Ave.** **Santa Clara, CA 95050**
EPA ID Number:	CAD982472151
Date of Inspection:	April 7, 2011
EPA Representatives:	Estrella Armijo RCRA Enforcement Officer (415) 972-3859 Amy Miller RCRA Enforcement Officer Ann Murphy CWA Enforcement Officer
Santa Clara City Fire Department:	Angela Giuliani Hazardous Materials Specialist
Facility Representatives:	Lucio DeAnda, President Pyramid Circuits, Inc. (408) 988- 5433
Report Prepared By:	Estrella Armijo

Signature: _____

Report Date: December 6, 2011

INTRODUCTION

The purpose of the investigation was to determine Pyramid Circuits, Incorporated's (herein "PCI" or the "facility"), compliance with applicable federal environmental statutes and regulations, and in particular, the Resource Conservation and Recovery Act ("RCRA"), as amended, the regulations provided in the Code of Federal Regulations ("CFR"), Chapter 40, Parts 261-265, 268, and 279, and the California Code Regulations ("CCR"), Title 22, Division 4.5 and the California Health and Safety Code, Division 20.

On April 7, 2011, Estrella Armijo, Amy Miller and Ann Murphy representing the U.S. Environmental Protection Agency ("EPA"), conducted an unannounced site investigation at the PCI facility (EPA ID Number CAD982472151), located at 1405 Richard Avenue, Santa Clara, California 95050. The EPA inspectors were accompanied by Angela Guiulani of the Santa Clara Fire Department.

Upon providing introductions and credentials to Lucio DeAnda, the inspectors explained that this was a routine inspection to determine if the facility was in compliance with federal and state regulations concerning the proper management of hazardous wastes. The inspection would consist of a walk-through of those areas of the facility where hazardous waste was handled, followed by a record review and a post-inspection briefing.

FACILITY BACKGROUND

Facility Name	Pyramid Circuits, Inc.
Number of Employees	2 part time, 3 full time
Hours of Operation	8:00 AM to 5:00 PM 5 days/week
Facility Processes	PCI manufactures double-sided, ridged, printed circuit boards.
Waste Streams	The facility discharges pretreated rinse water from its copper and tin-lead plating processes and from the photo development and screen printing operations. According to the Department of Toxic Substances Control's Hazardous Waste Tracking System, the facility disposes of D002, D008, F006, F007
Generator Status	Small Quantity Generator ("SQG")
Regulatory History	According to RCRAInfo the facility has never been inspected for compliance with RCRA Subtitle C.

FACILITY INSPECTION

The facility has been at its current location for 25 years and manufactures double-sided, ridged, printed circuit boards. Their processes include drilling, plating, imaging and screening. The facility has a 180 day hazardous waste storage area ("HWSA") outside of the building, a waste water treatment system ("WWTS"), and a batch treatment system for drag out.

According to California Department of Toxic Substances Control's ("DTSC") Hazardous Waste Tracking System ("HWTS") the waste streams identified in Chart 1 below, have been manifested for disposal in the last five years.

Chart 1: Manifested Waste Summary for 2006 – 2010

RCRA Code	*Description*	2006	2007	2008	2009	2010
D002	Corrosives	0.91740				
D008	Lead		5.96310	3.89895	5.04570	2.98155
F006	Wastewater treatment sludge	0.45000	0.84280		0.84280	0.75000
F007	Spent cyanide plating bath solutions			0.02085		
	TOTALS	**1.36740**	**6.80590**	**3.91980**	**5.88850**	**3.73155**

WALK THROUGH

The walk through consisted of a tour through the drilling room, plating lines, gold plating room, Imaging room, screening room, film area, QAQC area, shipping area, the WWTS, the batch tank operation, and the hazardous waste storage area ("HWSA"). Charts 2 and 3 below, describes the hazardous waste observed during the walk through of the process areas and HWSA, respectively.

Screening Room

The inspectors noted trash cans with contents emitting a strong acetone odor and requested a waste analysis. On May 4, 2011, PCI provided a waste determination for the contents of the trash in the screening room. The rags with acetone and solder mask are a D001 hazardous waste. PCI failed to make a waste determination prior to the inspection.

Plating Line

As the inspectors were led through the plating line, they cautioned the facility to maintain the process area by containing all used PPE and ensuring that secondary containment was kept dry and/or emptied daily. Rinse water is collected in the sump, where pH is adjusted and a polymer is added to enhance settling. The waste water is then pumped to two sequential holding tanks

and into a lamella clarifier for solids settling. The facility batch-treats drag-out from the plating operations. The drag-out is manually collected and pumped to one of three designated treatment tanks adjacent to the pretreatment system. The facility said the accumulation noted in the secondary containment was consistent with a day or two of operation. They later stated, in a follow up email that in the past the sump was emptied as needed but has been emptied daily for the last year. The facility should ensure that the sump is emptied daily and that they maintain a dry secondary containment.

The inspectors noted used PPE and rags throughout the plating line and requested a waste analysis. On May 4, 2011 PCI provided a waste analysis for the PPE and rags. They are a F006/D008 hazardous waste. The facility failed to make a waste determination for the PPE and rags prior to the inspection.

Gold Plating Room

The gold plating line had not been in use since February of 2008. It had several containers of what looked like expired chemical, useable chemical and waste. The inspectors requested the facility inventory the contents of the gold room. Below is a summary of the inventory provided on May 5, 2011.

Item	Description	Quantity	Disposal/ Removal	Length of Time in Area
Gold	5 Gallon container	1	Waste is removed by outside vendor	6 months
Spent Nickel	5 Gallon container	4	Waste is removed by outside vendor	6 months
Copper	1 Gallon container	1	Waste Batch Treated	Not sure
Lead Fluoborate Solution	5 Gallon container	1	New	11/22/2010
Ebonel C- blackening & coloring	110 lbs	1	New	11/19/2009
Cuposit 328L Copper Mix Concentrate	5 Gallon container	2	New	3/3/2011
Cuposit 328A Copper Mix Concentrate	5 Gallon container	1	New	2/24/2011
Peptone	5 Gallon container	1	New	
Screen Cleaner - OS-108	5 Gallon container	1	New	5/5/2010
Pumice	45 lb bags	2	New	2 years
Liquid Nickel Sulfate	5 Gallon container	1	Waste is removed by outside vendor	
Liquid Nickel Chloride	5 Gallon container	1	Waste is removed by outside vendor	

Chart 3: Hazardous waste storage at Pyramid Circuits Inc. - HWSA

Location	Container Type	Waste Type	Waste Description	Accum Start Date	Potential Violations	Comments (Photo Log Image Identification)
HWSA	Six 55-gallon container	Spent Etch D002, D004, D007, D008	Toxic, Corrosive, Liquid (Copper Solution)	1/4/2011	Failure to label a container of hazardous waste.	One of the 55-gallon containers was not labeled.
HWSA	55-gallon container	D002, D004, D007, D008	Copper tetramine dichloride, Chromium, Lead	10/01/10	Failure to obtain a permit for the storage of hazardous waste	The facility stored the 55-gallon container for 189 days. The waste was manifested for disposal on April 8, 2011. (IMG_0548– 0549) At the time of inspection the label was mistakenly recorded at 10/11/10 and the facility cautioned to remove within 4 days, however upon further review it appears the container had already exceeded the SQG storage limit.
HWSA	30-gallon container	Pb anode bags	Pb Anode bags	None	Failure to label a container of hazardous waste. Failure to close a container of hazardous waste.	(IMG_0553)

Post Inspection

The facility completed the following action items in response to the April 7, 2011 inspection:

Area/Item of Concern	Action Taken
Universal Waste - Light Bulbs in Drilling	Recycled on 4/23/11
Unlabeled Tin Lead Satellite Storage	Labeled on 4/8/11
Unlabeled Used Oil - hot oil machine	1 Gallon - Recycled on 4/23/11, labeled container
Unoperational Gold Room Floor	Rust on floor was cleaned
Spill Kit & Alarm in Waste storage area	Air horn and labeled spill kit in storage area
Waste reaching storage limit in 4 days (as of 4-7-11)	Waste was removed on 4/8/11 - see Manifest
Items in Red Metal Trash Cans	See Waste Profile - satellite storage will be used

Areas of Concern:

- PCI had not used their gold room since 2008 and was not keeping inventory of the products contained in the room. They had hazardous waste mixed with product and potentially expired chemical. PCI needs to ensure that inventory is taken in chemical storage areas and that hazardous waste is moved to the hazardous waste storage area.

Chart 2: Hazardous waste storage at Pyramid Circuits Inc.

Location	Container Type	Waste Type	Waste Description	Accum Start Date	Potential Violations	Comments
Drilling Area	Uncontained	Universal Waste	10 spent fluorescent tubes	None	Failure to label a container of hazardous waste. Failure to close a container of hazardous waste.	The tubes were located on a shelf in the drilling area. They were not contained or labeled. (IMG_0489-0490)
Gold Plating Room	Several	Unidentified	None	None	Failure to label hazardous waste	The Gold Plating room had chemicals that need to be identified as waste or product. The room was in very poor condition. There were several containers labeled spent nickel mixed with what appeared to be expired chemical and product. (IMG _0499-0506)
Plating area	5-gallon bucket	Unlabeled	Tin-Pb Particles	None	Failure to label a container of hazardous waste. Failure to close a container of hazardous waste.	(IMG_0493)
Plating area – Hot Oil Machine	2-gallon container	Unlabeled	Used Oil	None	Failure to label "used oil".	There was a significant amount of oil around the hot oil machine. There were three 1-gallon containers of unlabeled used oil, and two open approximately 5-gallon containers of unlabeled used oil ((IMG_0495 – 0498)
Plating area	5-gallon bucket	Unlabeled	Rinse water containing copper and ammonia	None	Failure to label a container of hazardous waste. Failure to close a container of hazardous waste.	(IMG_0514)
Plating area	Two 55-gallon container	Unlabeled	Spent etchant (Corrosive)	None	Failure to label in a satellite accumulation area ("SAA"). Failure to close a container of hazardous waste in a SAA. Exceeding the 55-gallon storage limit in an SAA.	The facility had 2 55-gallon containers for the same waste stream in the same SAA. One of the drums was open with a funnel in it. (IMG_0519, IMG_0521-0522, IMG_0525)
Plating area	Two 5-gallon containers	Unlabeled	Copper solution tank clean out	None	Failure to label a container of hazardous waste. Failure to close a container of hazardous waste.	(IMG_0528)

Hazardous Waste Storage Area

The hazardous waste storage area did not have emergency postings or an alarm system. A waste analysis of the dry film waste in the storage area was requested. On December 2, 2011 PCI provided an MSDS for the material stating it is non-hazardous.

The facility should keep product and waste separate so it easily identified for employees and regulators.

- The hot oil machine in the plating area had oil pooling around it. PCI should ensure that no oil is spilled from the hot oil machine. If there is a spill, it should be cleaned up immediately and properly stored and disposed of.
- Housekeeping at the facility is poor and should be addressed. All spills should be cleaned up immediately and PPE and rags should be disposed of properly.
- The facility's chemical storage area was not properly segregated to prevent storing incompatibles next to each other.

RECORDS REVIEW

Manifests
No violations found

Land Disposal Restriction (LDR) Notifications
No violations found

Inspection Logs
Inspection logs for 2011 were reviewed. No violations were found.

Potential Violations of California Title 22CCR and RCRA 40CFR Hazardous Waste Regulations

Failure to Obtain a Permit for the "Storage" of "Hazardous Waste"

CCR §66262.34(d)
40 §CFR §262.34(d)

Requirements:
A generator who generates greater than 100 kilograms but less than 1000 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status

Findings: The facility had one 55-gallon container of hazardous waste (D002, D004, D007, D008) in their HWSA with an accumulation start date of 10/01/10. The facility properly disposed of the hazardous waste on 4/8/2011. They exceeded the 180 day storage limit by 9 days.

Failure to Provide Required Equipment

22 CCR § 66265.32
40 CFR §265.32 as referenced by 40 CFR §262.34(d)(4)

Requirements:
All facilities must be equipped with the following,...

(a) An internal communications or alarm system capable of providing immediate emergency instruction(voice or signal) to personnel;

Findings: The facility did not have an alarm system at the time of inspection. The facility has since added an air horn and a labelled its spill kit in the hazardous waste storage area.

Failure to Post Required Emergency Response Information

22 CCR § 66265.32
40 CFR §265.32 as referenced by 40 CFR §262.34(d)(5)

Requirements:
The generator must post the following information next to the telephone:

(A) The name and telephone number of the emergency coordinator;
(B) Location of fire extinguishers and spill control material, and, if present, fire alarm; and
(C) The telephone number of the fire department

Findings: The facility did not have emergency postings nears phones at the time of inspection. No information on the posted of emergency response information has been provided.

Failure to Meet Hazardous Waste Container Labeling Requirements

22 CCR § 66262.34
40 CFR § 262.34 (d)(4)

Requirements:
(d) A generator who generates greater than 100 kilograms but less than 100 kilograms of hazardous waste in a calendar month may accumulate hazardous waste on-site for 180 days or less without a permit or without having interim status provided that:

(4) The generator complies with the requirements of paragraphs (a)(2) and (a)(3) of this section...

(a)(2) the date upon which each period of accumulation begins is clearly marked and visible for inspection on each container; and

(a)(3) the generator complies with the requirements of subsection (f) of this section;

(f) Generators who accumulate hazardous waste on site without a permit or grant of interim status shall comply with the following requirements: (2) the date the applicable accumulation period specified in subsection (a) or (d) of this section begins, for purposes of subsections (a) and (b) of this section, shall be clearly marked and visible for inspection on each container and tank; and (3) each container and tank used for onsite accumulation of hazardous waste shall be

labelled or marked clearly with the words, "Hazardous Waste." Additionally, all containers and shall be labelled with the following information:

(A) composition and physical state of the wastes;
(B) statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);
(C) name and address of the person producing the waste.

Findings: PCI failed to label containers of hazardous waste in the HWSA, plating area and Gold Room. The facility did not label one 55-gallon container of spent etch and one 30-gallon container of Pb anode bags in the HWSA. They failed to label one 5-gallon container of Tin-Pb waste, one 5-gallon container of rinse water, and two 5-gallon containers of tank cleanout waste in the plating area. The gold room, last operated in 2008, stored one 5-gallon container of liquid nickel sulfate, one 5-gallon container of liquid nickel chloride, four 5-gallon containers of spent nickel, one 5-gallon container of gold plating was and one 1-gallon container of non-RCRA hazardous waste; none of the containers were labeled. PCI has since properly disposed these wastes.

Failure to Close a Container Holding Hazardous Waste

22 CCR §66265.173
40 CFR 265.173(a) as referenced by 40 CFR §262.34(a)(4)

(a) A container holding hazardous waste shall always be closed during transfer and storage, except when it is necessary to add or remove waste.
(b) A container holding hazardous waste shall not be opened, handled, transferred or stored in a manner which may rupture the container or cause it to leak. Re-use of containers for transportation shall comply with the requirements of the U.S. Department of Transportation regulations, including those set forth in 49 CFR section

Findings: The facility failed to close containers in the HWSA and the plating area. Specifically, they did not close one 5-gallon container of Tin-Pb waste, one 5-gallon container of rinse water, and two 5-gallon containers of tank cleanout waste in the plating area and one 30-gallon container of Pb anode bags in the HWSA.

Satellite Accumulation Area (SAA)

Failure to Accumulate Less than 55-gallons of Hazardous Waste in a Satellite Accumulation Area

22 CCR § 66262.34(e)(1)
40 CFR § 262.34(c)(1)

(e)(1) A generator may accumulate as much as 55 gallons of hazardous waste, one quart of acutely hazardous waste (listed in section 66261.33(e)) or one quart of extremely hazardous waste at or near any point of generation, without a permit or grant of interim status, without complying with subsections (a), (b) and (c) of this section, if all of the following requirements are met with respect to this waste:

Findings: The facility was accumulating two unlabeled 55-gallons containers of spent etchant in plating area. No information on the status of this SAA was provided.

Failure to Label Hazardous Waste in a Satellite Accumulation Area

22 CCR § 66262.34(C), (E) & (f)(3)
40 CFR § 262.34 (c)(1)(ii)

(C) the initial date of waste accumulation is clearly marked and visible for inspection on each container used for accumulation of hazardous waste;
(E) the generator complies with subsections (e)(2), (e)(3) and (f)(3) of this section
(f) Generators who accumulate hazardous waste on site without a permit or grant of interim status shall comply with the following requirements clearly with the words, "Hazardous Waste." Additionally, all containers and portable tanks shall be labeled with the following information:

(3) each container and tank used for onsite accumulation of hazardous waste shall be labeled or marked clearly with the words, "Hazardous Waste." Additionally, all containers and portable tanks shall be labeled with the following information:

(A) composition and physical state of the wastes;

(B) statement or statements which call attention to the particular hazardous properties of the waste (e.g., flammable, reactive, etc.);

(C) name and address of the person producing the waste.

Findings: The facility was accumulating two unlabeled 55-gallons containers of spent etchant in plating area. No information on the status of this SAA was provided.

Universal Waste

Failure to Label Universal Waste

22 CCR § 66273.14(c)
40 CFR § 273.14 (d)(1)

Each lamp or a container or package in which such lamps are contained shall be labeled or marked clearly with one of the following phrases: "Universal Waste-Lamps(s)," or "Waste Lamp(s)," or "Used Lamp(s)."

Note: In 2009, California's regulations covering labeling/marking requirements for universal waste changed. The new citation for lamps, ***22 CCR § 66273.34****, states:*

(c) Lamps (including M003 wastes that contain lamps) (i.e., each lamp), or a container or package in which the lamps are contained, shall be labeled or marked clearly with the following phrase: "Universal Waste-Lamp(s)".

Findings: The facility had 10 unlabeled universal waste lamps in the drilling area. The lamps were recycled on 4/23/2011.

Failure to Properly Manage Universal Waste

22 CCR § 66273.33(b)(1)

40 CFR § 273.13 (c)(1)

A universal waste handler shall contain any lamp in a container or package that is structurally sound, adequate to prevent breakage, and compatible with the contents of the lamp. Such a container or package shall remain closed and shall lack evidence of leakage, spillage or damage that could cause leakage under reasonably foreseeable conditions.

Findings: *The ten unlabeled universal waste lamps in the drilling area were not in closed containers. The lamps were recycled on 4/23/2011.*

Failure to Demonstrate the Length of Time Accumulating Universal Waste

22 CCR § 66273.35
40 CFR § 273.15 (c)

(a) A universal waste handler shall accumulate universal waste for no longer than one year from the date the universal waste was generated, or was received from another universal waste handler.
(b) A universal waste handler shall be able to demonstrate the length of time that the universal waste has been accumulated from the date it became a waste or was received. The universal waste handler may make this demonstration by:
(1) Placing the universal waste in a container and marking or labeling the container with the earliest date that any universal waste in the container became a waste or was received;
(2) Marking or labeling the individual item of universal waste (e.g., each battery or thermostat) with the date it became a waste or was received;
(3) Maintaining an inventory system onsite that identifies the date the universal waste being accumulated became a waste or was received;
(4) Maintaining an inventory system onsite that identifies the earliest date that any universal waste in a group of items of universal waste or a group of containers of universal waste became a waste or was received;
(5) Placing the universal waste in a specific accumulation area and marking or labeling the area to identify the earliest date that any universal waste in the area became a waste or was received; or
(6) Any other method which clearly demonstrates the length of time that the universal waste has been accumulated from the date it became a waste or was received

Findings: The facility was not able to clearly demonstrate the length of time that the universal waste had been accumulating. The lamps were recycled on 4/23/2011.

Potential Violations of California Title 22 CCR:

Failure to Label Used Oil
22 CCR §66279.21

(a) Generators of used oil shall comply with the requirements of chapter 12 of this division (commencing with Section 66262.10).
(b) Containers and aboveground tanks used to store used oil and fill pipes used to transfer used oil into underground storage tanks shall be marked or clearly labeled with the words "USED OIL".

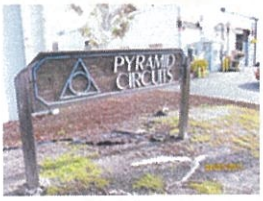
Findings: The facility had three 1-gallon containers of unlabeled used oil, and two open approximately 5-gallon containers of unlabeled used oil. The facility recycled 1 gallon or used oil on 4/23/11 and labeled a container. It is not clear if all of the containers identified are currently labeled and properly stored.

Photo Log

Image Identification	Number	Location	Description
IMG_0488	1	Outside front	Photo of sign outside of Pyramid Circuits
IMG_0489	2	Drilling Room	Drilling Room photos of unlabeled, uncontained universal waste
IMG_0490	3	Drilling Room	Drilling Room photos of unlabeled, uncontained universal waste
IMG_0491	4	Plating Area	Secondary containment around plating line
IMG_0492	5	Plating Area	Photo of plating area
IMG_0493	6	Plating Area	Pb bars said to be recycled
IMG_0494	7	Plating Area	Open 5-gallon bucket of tin-Pb particles, open and unlabeled
IMG_0495	8	Oil	Hot oil machine
IMG_0496	9	Oil	Open container of used oil/ Oil spilled throughout area
IMG_0497	10	Oil	Photo of leaking hot oil machine
IMG_0498	11	Oil	Three 1-gallon containers of used oil not labeled
IMG_0499	12	Gold Plating Room	Several containers of stored chemical and waste
IMG_0500	13	Gold Plating Room	Spent nickel waste from gold baths
IMG_0501	14	Gold Plating Room	Spent nickel waste from gold baths
IMG_0502	15	Gold Plating Room	Spent nickel waste from gold baths
IMG_0503	16	Gold Plating Room	Spent nickel waste from gold baths
IMG_0504	17	Gold Plating Room	Spent nickel waste from gold baths
IMG_0505	18	Gold Plating Room	Spent nickel waste from gold baths
IMG_0506	19	Gold Plating Room	Open container of nickel waste
IMG_0507	20	Gold Plating Room	Containers and staining below baths in gold plating room - rust
IMG_0508	21	Gold Plating Room	Staining below baths in gold plating room - rust
IMG_0509	22	Gold Plating Room	Staining below baths in gold plating room - rust
IMG_0510	23	Gold Plating Room	Staining below baths in gold plating room and pH strip being inserted to liquid accumulation behind nitric acid and water in other side of gold plating room wall
IMG_0511	24	Gold Plating Room	Close up of liquid accumulation behind nitric acid and water other side of gold plating room wall
IMG_0512	25	Gold Plating Room	pH strip results
IMG_0513	26	Gold Plating Room	pH strip results comparison with unused pH strip
IMG_0514	27	Plating Area	Open container of waste ammonia and copper
IMG_0515	28	Plating Area	Two 5-gallon containers of unlabeled waste
IMG_0516	29	Plating Area	Waste containers poor housekeeping
IMG_0517	30	Plating Area	Waste containers poor housekeeping

IMG_0518	31	Plating Area	Waste containers poor housekeeping
IMG_0519	32	Plating Area	Funnel in 55-gallon drum in SAA
IMG_0520	33	Plating Area	Waste containers poor housekeeping
IMG_0521	34	Plating Area	55-gallon container of hazardous waste in SAA not labeled
IMG_0522	35	Plating Area	55-gallon container of hazardous waste in SAA not labeled exceeding 55-gallon storage limit
IMG_0523	36	Plating Area	Secondary containment around plating line
IMG_0524	37	Plating Area	Rinse tank with hose for pumping in tank
IMG_0525	38	Plating Area	55-gallon drum in SAA
IMG_0526	39	Plating Area	Sump - location of pumping measurement of liquid accumulation
IMG_0527	40	Plating Area	Sump - location of pumping
IMG_0528	41	Plating Area	Two open containers of copper solution waste
IMG_0529	42	Plating Area	Ramp to exit plating area
IMG_0530	43	Screening Room	Screening Room Debris
IMG_0531	44	Screening Room	Screening Room Debris
IMG_0532	45	Screening Room	Screening Room Debris
IMG_0533	46	Ramp	Ramp between chemical storage area and HWSA
IMG_0534	47	HWSA/ Storage Area	Overview shot
IMG_0535	48	HWSA/ batch treatment area	Overview shot
IMG_0536	49	Storm Drain	Storm Drain
IMG_0537	50	Storage Area	Storm Drain
IMG_0538	51	Storage Area	Used battery on ground
IMG_0539	52	Storage Area	5-gallon container of linseed oil
IMG_0540	53	Storage Area	Open obsolete plating bath with trash
IMG_0541	54	HWSA	Staining from container
IMG_0542	55	HWSA	Sump in HWSA
IMG_0543	56	HWSA	Overview of HWSA
IMG_0544	57	HWSA	Copper Solution 1/4/11
IMG_0545	58	HWSA	Copper Solution 1/4/11
IMG_0546	59	HWSA	Copper Solution 1/4/11
IMG_0547	60	HWSA	Copper Solution 1/4/11
IMG_0548	61	HWSA	Corrosive Liquid 10/01/10
IMG_0549	62	HWSA	Close up of accumulation start date on corrosive liquid 10/01/10
IMG_0550	63	HWSA	Tote of copper filter cake with lead12/13/10
IMG_0551	64	HWSA	Close up of label of copper filter cake lead 12/13/10
IMG_0552	65	HWSA	Close up of label of copper filter cake lead 12/13/10
IMG_0553	66	HWSA	Open container of lead anode bags
IMG_0554	67	HWSA	Open container of dry film sludge

IMG_0555	68	HWSA	Sump
IMG_0556	69	HWSA	Sump
IMG_0557	70	Chemical Storage Area	Incompatible Waste Storage
IMG_0558	71	Chemical Storage Area	Incompatible Waste Storage



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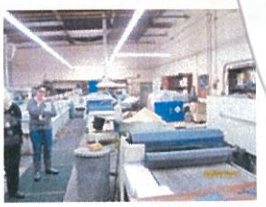
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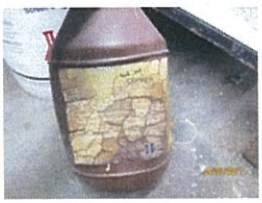
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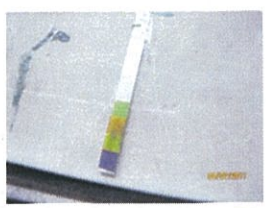
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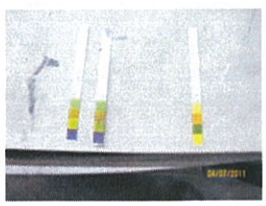
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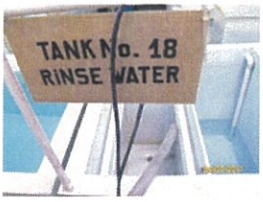

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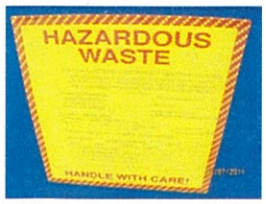

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